

Comments Submitted 3/19/21

OCO is strongly supportive of the proposed revisions to 110.100, in particular the added language in sections I.A.1; II.A.2; II.B.1; II.B.1.a.; II.B.3.d.; II.C.1.a.; II.C.7; and V.A.3.b.

I.A. OCO is strongly supportive of “retaliation” being added to this list. We also suggest adding “discrimination” after “retaliation” (“...from personal abuse, corporal punishment, personal injury, disease, property damage, retaliation, discrimination, and harassment.”)

II.C.2. We suggest adding “and encourage participation in” after “Provide” and adding “self-care” or “wellness” after “self-improvement.” (“Provide and encourage participation in training, self-improvement, and self-care [wellness] opportunities for employees.”)

V.A.3. Add “to include Close Observation Areas” as part of c., or adding COAs as a stand-alone in that list.